

ACCC inquiry into NBN wholesale service standards Second discussion paper

As an end user whose NBN service is provided via FTTN technology I have the following points to make/raise regarding the these questions from your paper.

8. Does the information NBN Co makes available to RSPs about service speeds appropriately support RSPs advertising and selling of services?

10. What wholesale commitments should apply where service performance consistently falls below what is ordered or reasonably expected

18. What additional wholesale arrangements should be put in place in relation to operational information to facilitate RSPs providing a reasonable level of customer service to end-users?

22. Are there any other wholesale service level terms that you consider should be implemented? How should these be implemented, and why?

8

No RSP will advise end-users what the maximum attainable download speed at their property is until after the service has been connected. This is despite this information being available from NBN. An end-user may also have to pay a connection fee to the RSP which does not appear to be refundable if the service is not acceptable to the end-user. RSP's should provide end-users with the maximum attainable speed at their property as well as typical evening speeds to allow end-users to make an informed decision prior to signing for a service.

10, 18 & 22

Due to the distance to the node servicing my property the current maximum attainable download speed is 29-31mbps. NBN have advised that following the end of the co-existence period this should raise to a likely maximum of 40mbps.

Despite NBN and RSP's advising end-users that they have a choice of speed plans and that these should be chosen based on the end-users needs, it is quite clear (based on end users in a situation similar to myself) that a choice of speed plans DO NOT exist. My choice is to either opt for the slowest plan of 25mbps or pay for a 50mbps plan which will only offer 60-80% of the speed of the plan. No RSP can change that as the limitation is due to the technology provided by NBN.

Currently any issue(s) regarding speeds that impact end-users are referred by NBN to the RSP who are not solely responsible especially in respect of speeds limited by FTTN. NBN will not take any responsibility and continue to charge full wholesale costs even if the technology provided by them limits the actual attainable speed.

Under section 3 of your paper you state, "However, attainable speeds may also be impacted by technical limitations of the NBN network. Technical limitations impacting on service speeds are particularly relevant to FTTN services while these must co-exist with legacy copper services." – however these limitations will continue to exist after the end of co-

existence (e.g. in my case the maximum speed will be limited to 40mbps due to node distance)

My solution to this (if NBN continue to refuse to provide an equitable service to all end-users via the technology they provide) is to charge RSP's (and therefore end-users) a wholesale fee proportionate to the attainable speed, i.e. using my case as an example: should I wish to choose a plan that can provide faster download speeds there is no point in opting for a 100mbps plan as the fastest attainable speed is 30-40mbps. However, I would then have to pay the full cost of a 50mbps plan despite the fact that the technology provided by NBN will not allow that speed. I would be happy to pay 60-80% of the cost for the speed(s) that can be provided but fail to understand why I should pay 100% cost for 60-80% service.

2 choices in wholesale costs could be implemented

1. A wholesale speed cost based on the current maximum available speed of 100mbs which could then be charged proportionally to the maximum attainable speed at an individual property (and being limited by NBN's choice of technology servicing said property)
2. Retaining the current wholesale speed plans but again charging a proportional fee based on the maximum attainable download speed at the individual property (and being limited by NBN's choice of technology servicing said property)

This would give end-users on FTTN at least some further choice and fairer charges. NBN would be more accountable, RSP's would have the ability to offer end-users a greater choice of plans based on what is available in real time (advertise the maximum attainable speed and typical evening speed based on what is actually available at individual premises) therefore also giving end-users a greater choice in providers based on not only what limitations are the responsibility of NBN but also the RSP's.